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N.F. and Angelo Ferrara
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8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

10
11 CORY SPENCER, an individual;
DIANA MILENA REED, an
12 individual; and COASTAL
PROTECTION RANGERS, INC., a
13 California non-profit public benefit
corporation;

14 Plaintiffs,

15 v.

16 LUNADA BAY BOYS; THE
INDIVIDUAL MEMBERS OF THE
LUNADA BAY BOYS, including but
17 not limited to SANG LEE, BRANT
BLAKEMAN, ALAN JOHNSTON aka
18 JALIAN JOHNSTON, MICHAEL
RAE PAPAYANS, ANGELO
19 FERRARA, FRANK FERRARA,
CHARLIE FERRARA, and N.F.; CITY
20 OF PALOS VERDES ESTATES;
CHIEF OF POLICE JEFF KEPLEY, in
21 his representative capacity; and DOES 1
- 10,

22 Defendants.
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Case No. 2:16-cv-02129-SJO-RAO

Assigned to District Judge:
Hon. S. James Otero; Courtroom: 10C
@ 350 W. First Street, L.A., CA 90012

Assigned Discovery:
Magistrate Judge: Hon. Rozella A. Oliver

**DEFENDANT ANGELO FERRARA'S
SEPARATE STATEMENT OF
UNCONTROVERTED FACTS AND
EVIDENCE IN SUPPORT OF
MOTION FOR PARTIAL SUMMARY
JUDGMENT**

[Filed concurrently with Notice, Motion
and Points and Authorities For Partial
Summary Judgment; Declaration of Mark
C. Fields; [Proposed] Order

Date: August 21, 2017
Time: 10:00 a.m.
Ctrm: 10C; Hon. S. JAMES OTERO

Complaint Filed: March 29, 2016
Trial: November 7, 2017

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TO THE PARTIES AND TO THEIR ATTORNEYS OF RECORD:

Defendant Angelo Ferrara ("Angelo") hereby respectfully submits the following Separate Statement of Uncontroverted Facts in support of his Motion for Summary Adjudication.

Defendant's Statement of Uncontroverted Facts	Evidence in Support of Statement of Uncontroverted Facts
<p>1. Before January 2016, Cory Spencer ("Spencer") visited Lunada Bay on at least eight to ten occasions.</p>	<p>1. Declaration of Mark C. Fields ("Fields Dec."), ¶ 2, Ex. A: October 11, 2016 Deposition of Plaintiff Cory Eldon Spencer ("Spencer Deposition") 59: 9-12; 64: 13-25; 65: 1-8.</p>
<p>2. Since January 29, 2016, Spencer has visited Lunada Bay on at least three to five occasions.</p>	<p>2. Fields Dec., ¶ 2, Ex. A: Spencer Deposition 170:9-21.</p>
<p>3. Spencer has no personal knowledge of having ever met Angelo or of Angelo engaging in any wrongful behaviour.</p>	<p>3. Fields Dec., ¶ 2, Ex. A: Spencer Deposition, 217:1 – 222:15.</p>
<p>4. Plaintiff Diana Milena Reed ("Reed") has visited Lunada Bay on at least four occasions – January 6, 2016, January 29, 2016; February 5, 2016; and February 13, 2016</p>	<p>4. Fields Dec., ¶ 3, Ex. B: October 24, 2016 Deposition of Diana Milena Reed, 105: 13-15; 103: 19-25; 104: 1-9; 146: 11-15; 156: 23-25; 157: 1-5</p>

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5. Reed has no personal knowledge of having ever met Angelo or of Angelo engaging in any wrongful behaviour.	5. Fields Dec., ¶ 4, Ex. C: October 25, 2016 Deposition of Diana Milena Reed, 343:16 – 345:13
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Dated: July 24, 2017

LAW OFFICES OF MARK C. FIELDS, APC

By /s/ Mark C. Fields
Mark C. Fields
Attorneys for Defendants
Angelo Ferrara and N.F.